

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

*Evon Smalls. v. Zhejiang Pharmaceutical Co.,
et al.,*

Case No. 1: 20-cv-08199-RBK-KMW

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MDL NO. 2875

HON. ROBERT B. KUGLER

NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF EVON SMALLS

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, Huahai U.S. Inc. and Princeton Pharmaceutical Inc. will take the deposition upon oral examination of Evon Smalls, on **June 28, 2021 at 9:00 a.m. EDT**, and continuing until completion, via remote deposition while the witness is at his home or office or other location agreed to by the parties.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Raymond Vanderhyden
Duane Morris LLP
30 S 17th Street,
Philadelphia, PA 19103
ravanderhyden@duanemorris.com

Date: June 11, 2021

Respectfully submitted,

/s/ Raymond Vanderhyden
Raymond Vanderhyden
Duane Morris LLP
30 S 17th Street,
Philadelphia, PA 19103
ravanderhyden@duanemorris.com

*Attorney for Zhejiang Huahai Pharmaceutical
Co., Ltd., Huahai US Inc., Solco Healthcare U.S.,
LLC, and Princeton Pharmaceutical Inc.*

CERTIFICATE OF SERVICE

I certify that on June 11, 2021 a true and correct copy of the foregoing Notice of Videotaped Deposition of Plaintiff Evon Smalls was served upon all counsel of record via CM/ECF. I further certify that a copy of the foregoing was served on the following counsel by email on June 11, 2021:

Daniel A. Nigh (via email, counsel for Plaintiff Smalls)

Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)

Ruben Honik, Esq. (via email)

David Stanoch, Esq. (via email)

Conlee Whiteley, Esq. (via email)

Seth A. Goldberg, Esq. (via email)

Jessica Priselac, Esq. (via email)

Clem C. Trischler, Esq. (via email)

Sarah E. Johnston, Esq. (via email)

s/ Raymond A. Vanderhyden

Raymond A. Vanderhyden